

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

SCOTT SWANSON,

Plaintiff,

Case No.: 16-cv-705

v.

EPIC SYSTEMS CORPORATION,

Defendant.

DECLARATION OF ATTORNEY COLIN B. GOOD

I, Colin B. Good, do hereby declare:

1. I am an attorney with the law firm Hawks Quindel, S.C. and am one of the attorneys representing Scott Swanson, the Plaintiff in this action.

2. I received documents produced by Defendant containing data on applicants for the trainer position for a two-year period pursuant to Plaintiff's First Set of Discovery Requests. Attached hereto as **Exhibit A** is a copy of Defendant's Responses to Plaintiff's First Set of Discovery Requests (Ex. A, Defendant's Responses to Plaintiff's First Set of Discovery Requests.)

3. I supervised the compilation of data provided in response to Plaintiff's Interrogatory No. 9 into a spreadsheet identifying data on applicants for the trainer position for a two-year period pursuant to Plaintiff's First Set of Discovery Requests. Due to the volume of those applications, they have not been submitted with this

Declaration, but can be submitted to the Court if required. Attached hereto as **Exhibit B** is a copy of the spreadsheet over which I supervised.

4. The parties in this case have engaged in discovery. Attached to this Declaration are true and correct copies of the following documents produced in discovery:

- a. **Exhibit C**: Nov. 14, 2014 emails between Tanya Bui and Scott Swanson, Bates No. EPIC001531.
- b. **Exhibit D**: Recruiter Training Manual Excerpts, Bates No. EPIC001680-1701, EPIC001745-1751, EPIC001798-1805, EPIC001841-1849, EPIC001857-1866.
- c. **Exhibit E**: Facesheets for select individuals hired as trainers by Epic, Bates No. EPIC001897-1918, EPIC001958-1966, EPIC002019-2025, EPIC002044-2050, EPIC002060-2105, EPIC002116-2126, EPIC002136-2144, EPIC002153-2160, EPIC002170-2187.
- d. **Exhibit F**: Defendant's Supplemental Responses to Plaintiff's First Set of Discovery.
- e. **Exhibit G**: Epic's ERD Position Statement.

Dated this 29th day of September, 2017.

/s/ Colin B. Good

Colin B. Good